

# EXHIBIT 8

CAROL T. JACOBS  
U.S. VIRGIN ISLANDS vs JP MORGAN CHASE

July 13, 2023

1

1                   UNITED STATES DISTRICT COURT FOR THE  
2                   SOUTHERN DISTRICT OF NEW YORK  
3                   CASE NUMBER: 22-CV-10904-JSR  
4                   ACTION FOR DAMAGES

5                   GOVERNMENT OF THE UNITED STATES         )  
6                   VIRGIN ISLANDS,                             )  
7    )  
8    Plaintiff, )  
9    )  
10    )  
11    VS. )  
12    )  
13    )  
14    JP MORGAN CHASE BANK, N.A.,         )  
15    )  
16    Defendant. )  
17    )  
18    -----  
19    )  
20    )  
21    )  
22    )  
23    )  
24    )  
25    )

15                   VIDEO RECORDED DEPOSITION OF

16                   CAROL THOMAS JACOBS

17                   THURSDAY, JULY 13, 2023

20                   REPORTED BY:

21                   DENISE D. HARPER-FORDE  
22                   Certified Shorthand Reporter (CSR)  
23                   Certified RealTime Reporter (CRR)  
24                   Certified LiveNote Reporter (CLR)  
25                   Registered Professional Reporter (RPR)  
                         Notary Public (FLORIDA)

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1           Q. We have met before. I am  
2 David Ackerman with the law firm of  
3 Motley Rice. We represent the  
4 Government of the Virgin Islands in  
5 this action.

6           I'm just going to have a few  
7 questions for you. And I want to  
8 start with that document that was  
9 marked as Exhibit 10. Can you pull  
10 that in front of you?

11          A. Yes.

12          Q. And this is a document that's  
13 entitled "Complaint."

14          Do you see that?

15          A. Yes.

16          Q. Okay. Does the document  
17 indicate where the Complaint was  
18 filed?

19          A. It says United States District  
20 Court Southern District of New York.

21          Q. Was this Complaint filed in  
22 the Virgin Islands?

23          A. No, it was not.

24          Q. Okay. In your opinion, do you  
25 believe law enforcement has an

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1 obligation to monitor public dockets  
2 of every court in the country for  
3 allegations that may reference the  
4 Virgin Islands?

5 A. I don't. I think it's  
6 unreasonable. It would be an  
7 unreasonable obligation on the Virgin  
8 Islands.

9 Q. Okay. Thank you. We can put  
10 that document aside.

11 Let's go to Exhibit 1, which  
12 is that big document. And I want to  
13 start with the page that is -- I  
14 apologize, I need to find it -- 12500  
15 near the end of the document. Are you  
16 there?

17 A. Yes.

18 Q. And this is the E-mail chain  
19 that counsel showed you involving  
20 Clive Rivers and Denise George. And  
21 you were copied on several of these  
22 E-mails; is that correct?

23 A. Yes.

24 Q. Okay. If you would look  
25 please at the second page at the very